

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA,	§	
	§	
Plaintiff,	§	
	§	
vs.	§	Civil Action No. 4:11-cv-02659
	§	
\$35,131.00 IN U.S. CURRENCY,	§	
	§	
Defendant in rem.	§	

**CLAIMANTS' REPLY IN SUPPORT OF
MOTION FOR CLARIFICATION**

Claimants understood the Court's Order to Stay to be expressly conditioned on verification that Claimants will not be criminally investigated. *See, e.g., Shaffer v. United States*, 528 F.2d 920, 922-23 (4th Cir. 1975). A stay of this civil forfeiture case is not immunity from prosecution, and Claimants do not need such immunity. Claimants sought the stay to prevent the government from using the threat of criminal prosecution to influence the course of this proceeding. Nonetheless, if the government is not willing to eliminate that possibility, Claimants would on balance rather proceed with the bench trial -- lifting the stay -- even with the government's refusal to state its intentions.

Respectfully submitted,

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By: /s/ Bryce L. Callahan

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CERTIFICATE OF SERVICE

I hereby certify that on March 23, 2012, I electronically filed the foregoing with the Clerk of the Court using the CM/EMF system which will send notification of such filing to the following:

Albert Ratliff
Assistant U.S. Attorney
P.O. Box 61129
Houston, Texas 77208

/s/ Bryce L. Callahan

Bryce L. Callahan